

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TALENTHUB WORLDWIDE, INC.

Plaintiff,

-against-

TALENTHUB WORKFORCE, INC.; ERIC GOLDSTEIN; STANDARD CONSULTING, INC.; DIANE POREMBSKI; PATRICIA KAMPEL; TANYA WILSON (WELLARD); JEANNINE TRIOLO; VALERIE WEST; JOSEPH LIPINSKI; and J COMPUTER PRO, INC.

Defendants.

Case No. 24 Civ. 6264 (LGS)

Hon. Lorna G. Schofield

DECLARATION OF KENNETH W. TABER IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT

I, Kenneth W. Taber, declare as follows:

1. I am a partner at Pillsbury Winthrop Shaw Pittman LLP, counsel for Defendants Talenthub Workforce, Inc., Eric Goldstein, Standard Consulting, Inc., Diane Porembski, Patricia Kampel, Tanya Wilson (Wellard), Jeannine Triolo, Valerie West, Joseph Lipinski, and J Computer Pro, Inc. (collectively, "Defendants") in the above-captioned action. I am familiar with the facts set forth herein. I respectfully submit this declaration in support of Defendants' Motion to Dismiss the First Amended Complaint filed by Plaintiff Talenthub Worldwide, Inc. ("Plaintiff").

2. Attached hereto as **Exhibit A** is a true and correct copy of an email exchange between Diane Porembski, Patricia Kampel, Oren Glass, and Gary Glass, dated January 6, 2022, filed in the related New York State Court case, styled *Goldstein v. Glass*, Index No. 654474/2023 (Sup. Ct. N.Y. Cnty.) ("Goldstein v. Glass").

3. Attached hereto as **Exhibit B** is a true and correct copy of an email exchange between Diane Porembski, Patricia Kampel, Oren Glass, and Gary Glass, dated January 6, 2022, filed in the *Goldstein v. Glass* action.

4. Attached hereto as **Exhibit C** is a true and correct copy of a letter sent by Gary Glass's then legal counsel, Alexander Novak, Esq., to me, dated April 26, 2022.

5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts of a letter sent by Gary Glass's then legal counsel, Howard Sokol, Esq., to me, dated July 11, 2022.

6. Attached hereto as **Exhibit E** is a true and correct copy of the Verified Petition filed in the related New York State Court case, styled *Glass v. Talenthub Workforce, Inc.*, Index No. 157302/2023 (Sup. Ct. N.Y. Cnty.) ("*Glass v. Workforce*"), dated July 20, 2023. To comply with Rule III(B)(3) of Your Honor's Individual Rules and Procedures for Civil Cases, **Exhibit E** is split into two exhibits (Parts 1 and 2), each less than 15 pages.

7. Attached hereto as **Exhibit F** is a true and correct copy of the Verified Complaint filed in the *Goldstein v. Glass* action, dated September 13, 2023. To comply with Rule III(B)(3) of Your Honor's Individual Rules and Procedures for Civil Cases, **Exhibit F** is split into two exhibits (Parts 1 and 2), each less than 15 pages.

8. Attached hereto as **Exhibit G** is a true and correct copy of the Eric Goldstein's Memorandum of Law in Opposition to the Verified Petition filed in the *Glass v. Workforce* action, dated September 13, 2023. To comply with Rule III(B)(3) of Your Honor's Individual Rules and Procedures for Civil Cases, **Exhibit G** is split into two exhibits (Parts 1 and 2), each less than 15 pages.

9. Attached hereto as **Exhibit H** is a true and correct copy of the Order issued by the Honorable Nicholas W. Moyne in the *Glass v. Workforce* action, dated February 2, 2024.

10. Attached hereto as **Exhibit I** is a true and correct copy of the Order issued by the Honorable Nicholas W. Moyne in the *Goldstein v. Glass* action, dated July 3, 2024.

11. Attached hereto as **Exhibit J** is a true and correct copy of excerpts of Talenthub Worldwide, Inc.'s and Gary Glass's Verified Answer filed in the *Goldstein v. Glass* action, dated August 30, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 10, 2025

/s/ *Kenneth W. Taber*
Kenneth W. Taber